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### 10. PROGRAM COMPLIANCE

#### 10.03 Employee Compliance

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FINAL

#### TYPES OF EMPLOYEE VIOLATIONS\*

Each violation has a unique MDCH WIC code (example 1PA), for tracking purposes. The number provides a unique identifier, the letter **E means Employee**, and the letter A, S, or F identifies the **level** of violation: **A = Abuse, S = Severe Abuse, and F = Fraud** (based on the U.S. GAO Report #RCED-22-994, August 1999).

- 1EA Performing duties not within the scope of assigned authority .
- 2EA Failure to report a conflict of interest with other WIC staff, participants, vendors, or the employee's own participation in any WIC program.
- 1ES Unprofessional or unfair treatment toward WIC applicants, participants; other staff or WIC vendors. Discrimination toward WIC applicants, participants, other WIC staff and vendors. (Example: Failure to provide applicants with the name and address of a WIC vendor(s), due to race, color, national origin, etc). Refer to Policy 1.22 Civil Rights for procedures for processing discrimination complaints.
- 2ES Disclosing confidential information regarding participants to any non-WIC official or the public at-large.
- 3ES Altering coupons/EBT benefits; Attempted or actual use of altered coupons/EBT benefits.
- 4ES Enrolling one self or family member in to the WIC program.
- 5ES Verbal or Physical Abuse; or Verbal threat of physical abuse of WIC applicants, participants, other clinic staff or vendors; Destruction of property belonging to WIC applicants, participants, WIC staff or vendors and staff.
- 1EF Falsification of data for eligibility, i.e. Providing false information to receive WIC benefits.
- 2EF Theft of WIC coupons/EBT benefits
- 3EF Any of the abuses (1PA - 7PF) relating to participant abuse, when the employee is also a WIC participant.

\*See 10.02A For Definitions